

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF DELAWARE

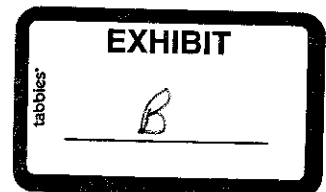
WILLIE DAVIS, JR.,	:	
NATHANIEL BRIDDELL,	:	
JOSEPH GARRISON,	:	C.A. NO.
LARRY E. GIBBS,	:	
ROY H. WALTERS,	:	JURY TRIAL DEMANDED
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
MOUNTAIRE FARMS OF	:	
DELAWARE, INC.,	:	
	:	
Defendant.	:	

AFFIDAVIT OF WILLIE DAVIS, JR.

STATE OF DELAWARE	:	
	:	SS.
COUNTY OF NEW CASTLE	:	

I, Willie Davis, Jr., having been duly sworn, depose and say as follows:

1. It was not a part of my job duties when I was a crew leader to hire or fire employees or to make any recommendations as to their employment status.
2. If there were times that I advised Doug Lynch about the possibility of hiring a catcher, it was because someone I knew needed a job.
3. I was never required to recruit people to be employed by Mountaire Farms.
4. If someone I knew wanted a job I would have them complete an application and/or send that person to Doug Lynch.
5. The total number of people who I had complete an application or sent to Doug

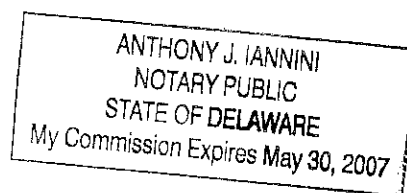


Lynch is very minimal.


WILLIE DAVIS, JR.

SWORN TO AND SUBSCRIBED before me, a Notary Public, for the State and
County aforesaid, this 1st day of May, 2005.


NOTARY PUBLIC



IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF DELAWARE

WILLIE DAVIS, JR.,	:	
NATHANIEL BRIDDELL,	:	
JOSEPH GARRISON,	:	C.A. NO.
LARRY E. GIBBS,	:	
ROY H. WALTERS,	:	JURY TRIAL DEMANDED
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
MOUNTAIRE FARMS OF	:	
DELAWARE, INC.,	:	
	:	
Defendant.	:	

AFFIDAVIT OF NATHANIEL BRIDDELL

STATE OF DELAWARE	:	
	:	SS.
COUNTY OF NEW CASTLE	:	

I, Nathaniel Briddell, having been duly sworn, depose and say as follows:

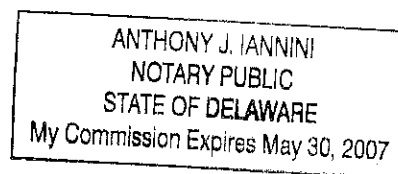
1. It was not a part of my job duties when I was a crew leader to hire or fire employees or to make any recommendations as to their employment status.
2. If there were times that I advised Doug Lynch about the possibility of hiring a catcher, it was because someone I knew needed a job.
3. I was never required to recruit people to be employed by Mountaire Farms.
4. If someone I knew wanted a job I would have them complete an application and/or send that person to Doug Lynch.

5. The total number of people who I had complete an application or sent to Doug Lynch is very minimal.

Nathaniel Bridgell
~~XXXXXXXXXX~~
NATHANIEL BRIDDELL

SWORN TO AND SUBSCRIBED before me, a Notary Public, for the State and County aforesaid, this 1st day of May, 2005.

Anthony J. Iannini
NOTARY PUBLIC



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NATHANIEL BRIDDELL,	:	
JOSEPH GARRISON,	:	C.A. NO.
LARRY E. GIBBS,	:	
ROY H. WALTERS,	:	JURY TRIAL DEMANDED
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
MOUNTAIRE FARMS OF	:	
DELAWARE, INC.,	:	
	:	
Defendant.	:	

AFFIDAVIT OF JOSEPH GARRISON

STATE OF DELAWARE	:	
	:	SS.
COUNTY OF NEW CASTLE	:	

I, Joseph Garrison., having been duly sworn, depose and say as follows:

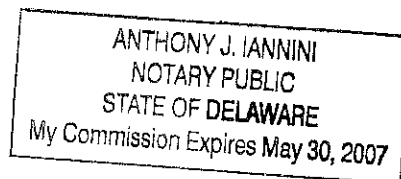
1. It was not a part of my job duties when I was a crew leader to hire or fire employees or to make any recommendations as to their employment status.
2. If there were times that I advised Doug Lynch about the possibility of hiring a catcher, it was because someone I knew needed a job.
3. I was never required to recruit people to be employed by Mountaire Farms.
4. If someone I knew wanted a job I would have them complete an application and/or send that person to Doug Lynch.
5. The total number of people who I had complete an application or sent to Doug

Lynch is very minimal.


JOSEPH GARRISON

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County aforesaid, this 1st day of May, 2005.


NOTARY PUBLIC



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NATHANIEL BRIDDELL,	:	
JOSEPH GARRISON,	:	C.A. NO.
LARRY E. GIBBS,	:	
ROY H. WALTERS,	:	JURY TRIAL DEMANDED
	:	
Plaintiffs,	:	
	:	
v.	:	
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MOUNTAIRE FARMS OF	:	
DELAWARE, INC.,	:	
	:	
Defendant.	:	

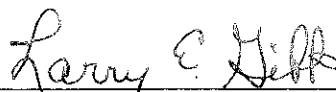
AFFIDAVIT OF LARRY E. GIBBS

STATE OF DELAWARE	:	
	:	SS.
COUNTY OF NEW CASTLE	:	

I, Larry E. Gibbs, having been duly sworn, depose and say as follows:

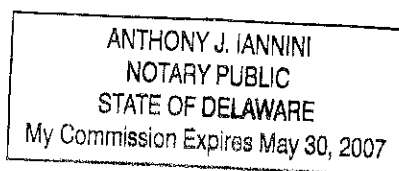
1. It was not a part of my job duties when I was a crew leader to hire or fire employees or to make any recommendations as to their employment status.
2. If there were times that I advised Doug Lynch about the possibility of hiring a catcher, it was because someone I knew needed a job.
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5. The total number of people who I had complete an application or sent to Doug

Lynch is very minimal.


LARRY E. GIBBS

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County aforesaid, this 1st day of May, 2005.


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Defendant.	:	

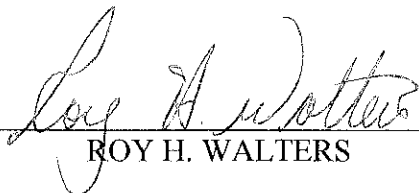
AFFIDAVIT OF ROY H. WALTERS

STATE OF DELAWARE	:	
	:	SS.
COUNTY OF NEW CASTLE	:	

I, Roy H. Walters, having been duly sworn, depose and say as follows:

1. It was not a part of my job duties when I was a crew leader to hire or fire employees or to make any recommendations as to their employment status.
2. If there were times that I advised Doug Lynch about the possibility of hiring a catcher, it was because someone I knew needed a job.
3. I was never required to recruit people to be employed by Mountaire Farms.
4. If someone I knew wanted a job I would have them complete an application and/or send that person to Doug Lynch.
5. The total number of people who I had complete an application or sent to Doug

Lynch is very minimal.



ROY H. WALTERS

SWORN TO AND SUBSCRIBED before me, a Notary Public, for the State and
County aforesaid, this 1st day of May, 2005.



NOTARY PUBLIC

